

8959-55

10/30/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms Patti Golick
Applied Biochemists
C/o Lonza Inc
90 Boroline Road
Allendale, NJ 07401

OCT 30 2013

Subject: Product Name: Harpoon Granular Aquatic Herbicide
EPA Reg. No. 8959-55
Submission date: 9/19/13
Notification for label Change per PRN 98-10: General label changes- Add note to reviewer, brackets in the Environmental Hazards section etc.
Decision Number 483510

Dear Ms Golick:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

The full product name on page 1, "Harpoon Granular Aquatic Herbicide" must be used globally throughout the label. Alternatively, you can change the name but in any case the full product name must used globally. You can accomplish this via a separate notification which includes a copy of this letter.

If you have questions concerning this letter, please contact Banza Djapao at 703-305-7269, or via email at djapao.banza@epa.gov or you may call me at 703-308-9443.

Sincerely,

A handwritten signature in black ink that reads "Banza Djapao".

Tony Kish
Product Manager 22
Fungicide Branch
Registration Division (7504P)

EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 8959-55	2. EPA Product Manager Tony Kish	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Harpoon Granular Aquatic	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Applied Biochemists c/o Lonza Inc. 90 Boroline Road Allendale, NJ 07401		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name
<input type="checkbox"/> Check if this is a new address		

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Not Subject to PRIA

Label Notification to add Note to Reviewer. Please see cover letter for details.

This notification is consistent with the provisions of PR-Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Patti Golick Date: 9/19/13

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input checked="" type="checkbox"/> Other (Specify) Bag	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 40 lbs.		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Patti Golick	Title Sr. Regulatory Services Associate	Telephone No. (Include Area Code) 201-316-9293
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <u>Patti Golick</u>	3. Title Sr. Regulatory Services Associate	
4. Typed Name Patti Golick	5. Date 9/19/13	

Note to reviewer: [Items in brackets [AAA] are optional and may/may not be included on final label]

HARPOON Granular Aquatic Herbicide

For use in slow moving or quiescent bodies of water, including golf courses, ornamental, fish and fire ponds; fresh water lakes, fish hatcheries and potable water reservoirs. Areas treated with Harpoon Granular Aquatic Herbicide may be used for fishing and swimming immediately after treatment.

Active Ingredient

*Copper Ethylenediamine Complex (CAS# 13426-91-0).....	9.87%
Inert Ingredients.....	90.13%
Total.....	100.0%

*Harpoon contains 3.41% elemental copper equivalent to 1.7 lbs per 50lbs of product.

KEEP OUT OF REACH OF CHILDREN

DANGER / PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand label, find someone to explain it to you in detail.)

FIRST AID	
If in eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye. Call a poison control center or doctor for treatment advice.
If swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center. Do not give anything by mouth to an unconscious person.
If inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. If a medical emergency arises contact Arch Chemicals Emergency Action Network in the US call 1-800-654-6911 or outside the US call 423-780-2970. For help with a spill, leak, fire or exposure involving this material call CHEMTREC 1-800-424-9300.	

See Additional Precautions on Back Panel

EPA Reg No. 8959-55
NET CONTENTS : _____ Pounds (____ kgs.)
MANUFACTURED FOR:



W175 N11163 Stonewood Drive Suite 234
GERMANTOWN, WISCONSIN 53022
1-800-558-5106
www.appliedbiochemists.com

EPA EST # xxxx-yy-zz

NOTIFICATION

OCT 30 2013

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Wear: Long-sleeved shirt and long pants, socks, shoes, and gloves.

For applications in waters destined for use as drinking water, those waters must receive additional and separate potable water treatment. Do not apply more than 1.0 ppm as metallic copper in these waters.

Personal Protective Equipment (PPE)

Mixers, loaders, applicators, and other handlers must wear the following:

- Long-sleeve shirt
- Long pants or coveralls
- Shoes and socks
- Chemical resistant gloves made out of any waterproof material
- Goggles or face shield

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic invertebrates. Water treated with this product may be hazardous to aquatic organisms. Treatment of aquatic weeds and algae can result in oxygen loss from decomposition of dead algae and weeds. This oxygen loss can cause fish and invertebrate suffocation. To minimize this hazard, do not treat more than 1/2 of the water body to avoid depletion of oxygen due to decaying vegetation. Wait at least [10 to] 14 days between treatments. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State or local agency with primary responsibility for regulating pesticides before applying to public waters, to determine if a permit is required.

Certain water conditions including low pH (≤ 6.5), low dissolved organic carbon (DOC) levels (3.0 mg/L or lower), and "soft" waters (i.e., alkalinity less than 50 mg/L), increases the potential acute toxicity to non-target aquatic organisms.

[This product] {or} [HARPOON Granular] may be hazardous to aquatic organisms. This product may be toxic to trout and other species of fish. Fish toxicity is dependent upon the hardness of water. Do not use in water containing trout if the carbonate hardness of water does not exceed 50 ppm. **Do not use in waters containing Koi and hybrid goldfish. Not intended for use in small volume, garden pond systems.**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not

discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

General Information

HARPOON Granular is a chelated copper formulation that effectively controls Hydrilla, Egeria (Brazilian Elodea), Naiads, Coontail, Elodea, Water Lettuce, Water Hyacinth, Giant Salvinia, and other species having a sensitivity to copper absorption. In waters with low alkalinity (hardness), HARPOON may also control Eurasian Watermilfoil and Horned, Sago, American, Curly-leaf, & Floating-leaf Pondweeds. HARPOON Granular may be applied to slow moving or quiescent bodies of water, including lakes, fish hatcheries, potable water reservoirs, golf courses, and ornamental, fish and fire ponds.

DIRECTIONS FOR USE

It is a violation of Federal Law to use HARPOON Granular in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

GENERAL APPLICATION RESTRICTIONS:

(For end-use products in containers \geq 50 pounds.)

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

(For end-use consumer products in containers less than 50 pounds)

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Some states may require permits for the application of this product to public waters. Check with your local authorities.

(For all sizes)

Do not enter or allow others to enter until application of product has been completed in the area.

PRE-TREATMENT CONSIDERATIONS:

(All sizes)

Injury may occur if concentrated HARPOON granules or treated water concentrations above 1.0 ppm of copper comes in contact with ornamentals, crops, grass, or other foliage. Do not exceed 1.0 ppm total copper in treated water.

HERBICIDE APPLICATION

Quiescent or Slow Moving Water

(For end-use products in containers \geq 50 pounds)

LARGE AREA TREATMENT (over 5,000 sq. ft.)

1. Identify form(s) of targeted submersed aquatic plants.
2. Estimate the targeted Plant Growth Height (in ft.) in the water column. This would be the distance from the base to the top of plants.
3. Calculate surface area (acres) of the treatment area (area of infestation) using the following formula:

$$\frac{\text{Length (ft.)} \times \text{Width (ft.)}}{43,560} = \text{Surface Acre(s)}$$
4. Refer to Table 1 to determine lbs. of Harpoon Granular to apply per Surface Acre based upon Plant Growth Height.
5. Distribute Harpoon Granular evenly over the water surface directly over the targeted vegetation, adjusting rates based upon the height of the vegetation in the water column. A dry fertilizer spreader

or blower may be used to ensure even distribution. For small area (spot) treatments (see below), product may be applied with a hand scoop or spreader.

(For end-use consumer products in containers less than 50 pounds)

SMALL AREA (SPOT) TREATMENT (under 5,000 sq. ft.)

For treatment around small areas such as docks, rafts, water intakes, etc., apply product uniformly at the rate of 2.0 pounds (29 oz.) per 1,000 square feet for each foot of plant growth height. (for example, use 4 lbs per 1,000 sq. ft. if plants are 2 foot tall). **Note:** In areas less than 1 ft. deep, reduce dosage by 2.4 oz. per inch of water per 1,000 sq. ft. so as to not exceed 1.0 ppm total copper.

Table 1
Pounds of HARPOON Granular to Apply per Surface Acre*

Submersed (target) species (In water of medium to high hardness)	ppm copper	Plant Growth Height (from bottom)		
		1 ft.	2 ft.	3 ft.
Hydrilla verticillata (Hydrilla)	0.75 -1.0	60 - 80	120 - 160	180 - 240
Egeria densa (Brazilian Elodea)	0.50 -0.75	40 - 60	80 - 120	120 - 180
Najas sp. (Southern/Northern Naiads)	0.50 -1.0	40 - 80	80 - 160	120 - 240
Ceratophyllum demersum (Coontail)	0.50 -1.0	40 - 80	80 - 160	120 - 240
Elodea canadensis (Common Elodea)	0.50 -1.0	40 - 80	80 - 160	120 - 240
The following plants should only be treated in waters where calcium carbonate hardness is less than 150 ppm				
Myriophyllum spicatum (Eurasian Watermilfoil)	0.75 -1.0	60 - 80	120 - 160	180 - 240
Potamogeton pectinatus (Sago Pondweed)	0.75 -1.0	60 - 80	120 - 160	180 - 240
Potamogeton nodosus (American Pondweed)	0.75 -1.0	60 - 80	120 - 160	180 - 240

*Select low range rate for Light to Moderate Growth and upper range rate for heavy infestations. Light to Moderate Growth is defined as a treatment area where submersed plants have not reached the water surface ("topped out") and less than 65% of the bottom or water surface (in the case of floating plants) is covered with target plants. Heavy Infestations are areas where submersed vegetation growth has reached the water surface and/or bottom growth cover more than 65% of the treatment area. Do not apply more than 1.0 ppm copper.

OTHER TREATMENT CONSIDERATIONS

- Confirm that target plants are either listed on this label or related to the listing provided. Not all aquatic plants are sensitive to Harpoon Granular.
- It may be necessary to test water hardness if there are trout. Minimum water hardness is 50 ppm.
- Apply early in the day under calm, sunny conditions. HARPOON Granular works best when water temperatures are at least 60°F.
- Treat when and where growth first begins to appear or create a nuisance.
- Apply in a manner that will ensure even distribution of the chemical within the treatment area.
- Re-treat areas if re-growth begins to appear and seasonal control is desired. Allow one to two weeks between consecutive treatments.
- Allow seven to ten days to observe the effects of treatment (bleaching and breaking apart of plant material).
- Under conditions of heavy infestation, treat only 1/3 to 1/2 of the water body at a time to avoid fish suffocation caused by oxygen depletion from decaying algae.

- Algae growth on and around target plants may interfere with the uptake of HARPOON Granular. Pre-treat these areas with Cutrine-Plus® algaecide. Do not exceed 1.0 ppm of total copper when using HARPOON Granular in combination with copper-based algaecides.

STORAGE & DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Keep container closed when not in use. Keep pesticide in original container. Do not store or transport near feed or food.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Open dumping is prohibited. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

{For <50 pound non-refillable containers only:}

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning if available or puncture and dispose of in approved landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Consult Federal, State or local authorities for approved alternative procedures.

{For >50 pound non-refillable containers only:}

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: empty the remaining contents into application equipment or a mix tank. Fill the container ¼ with water and recap. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available or puncture and dispose of in approved landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Consult Federal, State or local authorities for approved alternative procedures.

{Fiber drums or bagged materials:}

Completely empty liner or bag by shaking sides and bottom to loosen clinging particles. Empty residue into application equipment, then dispose of liner in a sanitary landfill or by incineration, if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in same manner.

Warranty

To the extent consistent with applicable law neither the manufacturer nor the seller makes any warranty, expressed or implied concerning the use of this product other than indicated on the label.

To the extent consistent with applicable law buyer assumes risk of use of this material when such use is contrary to label instructions. Read and follow the label directions.